

☐ Duplicate Original

Case No. 8:22-MJ-00340

AUSA: R. Wang

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No.:

8:22-MJ-00340

Date and time warrant executed:

05/11/22 12:48 PM

Copy of warrant and inventory left with:

USPS

Inventory made in the presence of:

HSI Ed Angeo.

Inventory of the property taken and name of any person(s) seized:

USPS # 9505 5141 4197 2122 8813 35

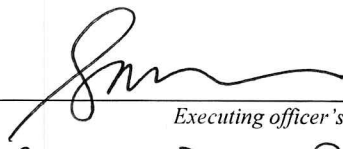
- 1,733 gross grams of green leafy substance suspected marijuana
- packaging material.

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date:

05/11/22


 Executing officer's signature

Sumyra Duly, Postal Inspector.

Printed name and title

AFFIDAVIT

I, Sumyra Duy, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a United States Postal Inspector ("USPI") with the United States Postal Inspection Service ("USPIS") and have been so employed since May 2012. I am currently assigned to the Contraband Interdiction and Investigation - South Team of the Los Angeles Division, which is responsible for investigating drug trafficking violations involving the United States Mail to distribute controlled substances and/or controlled substances proceeds.

2. I have completed a twelve-week basic law enforcement training course in Potomac, Maryland, which included training in the investigation of narcotics trafficking via the United States Mail. Additionally, I have attended a 40-hour Los Angeles Police Department Peace Officer Standards and Training Certified Academy Narcotics School. Prior to becoming a USPI, I worked as a financial investigator. I hold a Bachelor of Arts degree from California State University, Fullerton in Sociology and a Master's of Advanced Study from University of California, Irvine in Criminology, Law and Society. As part of my law enforcement duties, I have conducted numerous parcel investigations that have resulted in the arrest of individuals who have received and distributed controlled substances, as well as the seizure of the controlled substances and the proceeds of the sales of controlled substances.

II. PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of a search warrant for the SUBJECT PARCEL described below in paragraph 5 and Attachment A, for the items listed in paragraph 6 and Attachment B. Attachments A and B are incorporated herein by reference. The items to be seized constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance).

4. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

III. PARCEL TO BE SEARCHED

5. This affidavit is made in support of an application for a search warrant for the following United States Postal Service ("USPS") Priority Mail parcel (hereinafter referred to as the "SUBJECT PARCEL"):

a. The SUBJECT PARCEL is a USPS Priority Mail parcel bearing tracking number 9505 5141 4197 2122 8813 35. The

SUBJECT PARCEL is a white cardboard box weighing 7 pounds, 11 ounces. The SUBJECT PARCEL is addressed to "Mrs Marline Scott, 2246 Atkins Drive NW, Huntsville, Alabama 35810." The return address listed on the SUBJECT PARCEL is "Mrs. Norma Grant, 310 S. Jefferson St. Placenta, OC 92870 [sic]." The SUBJECT PARCEL was paid with \$34.45 in postage and postmarked on May 2, 2022, in Buena Park, CA 90622.

IV. ITEMS TO BE SEIZED

6. The items to be seized from the SUBJECT PARCEL constitute fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance). The items to be seized are identified in Attachment B and are incorporated herein by reference.

V. STATEMENT OF PROBABLE CAUSE

Background

7. Based on my training and discussions with experienced Postal Inspectors, I know that Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In particular, they began conducting organized interdictions of Express Mail and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances in Los Angeles, California, in the early 1990s. Along with conducting organized interdictions, Postal Inspectors also

regularly examine and investigate Express Mail and Priority Mail parcels throughout the year. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances using boxes, with the proceeds in the form of cash. Although Postal Inspectors still see the use of boxes for controlled substances and cash, there has been a gradual change over the years toward the current trend of smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances that lend a sense of legitimacy to the parcel.

8. From my training, personal experience, and the collective experiences related to me by Postal Inspectors on my team who specialize in investigations relating to the mailing of controlled substances and drug proceeds, I am aware that the greater Los Angeles area is a major source area for controlled substances. As such, controlled substances are frequently transported from the greater Los Angeles area via the United States Mail, and the proceeds from the sale of the controlled substances are frequently returned to the greater Los Angeles area via the United States Mail. These proceeds are generally in large amounts of money over \$1,000.

9. I also know, based on my training and experience, that drug traffickers will often use one of two USPS services: Priority Mail Express Service, which is the overnight/next day

delivery mail service, and Priority Mail Service, which is the two-to-three-day delivery mail service. Drug traffickers use Priority Mail Express delivery services because of their speed, reliability, and the ability to track the package's progress to the intended delivery point. Drug traffickers often use Priority Mail delivery services because they allow drug traffickers more time for travel between states if they are following their shipments to their destinations for distribution. Like Priority Mail Express, Priority Mail also allows drug traffickers to track the package's progress to the intended delivery point.

10. Based on information derived and built upon over many years, I, like other Postal Inspectors, initially look for certain characteristics when examining Priority Mail Express and Priority Mail for controlled substances or drug proceeds. These characteristics include:

- a. The article is contained in a box, flat cardboard mailer, or Tyvek envelope;
- b. The article bears a handwritten label; and/or
- c. The handwritten label on the article does not contain a business account number.

11. Parcels found to meet these characteristics are scrutinized by Postal Inspectors through further investigation, which may include return and addressee address verifications and trained narcotics-detecting canine examination. Postal Inspectors will also look for additional drug or drug proceed parcel characteristics such as:

a. The seams of the article are all taped or glued shut;

b. The article emits the odor of a cleaning agent, adhesive, or spray foam detectable by a human; and/or

c. Multiple articles are mailed by the same individual, on the same day, from different locations.

12. Based on my training and experiences and information learned during discussions with other Postal Inspectors, I know that drug traffickers often use fictitious or incomplete names and/or addresses in an effort to conceal their identity from law enforcement. Indeed, it is my experience that when real addresses are used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

Investigation of the SUBJECT PARCEL

13. In January 2022, USPIS and Homeland Security Investigations ("HSI") Orange County began investigating the activities of Laten POWELL, who was identified as shipping U.S. Mail parcels suspected of containing narcotics from Orange County, California.

14. On March 8, 2022, United States Magistrate Judge Karen E. Scott issued a warrant authorizing the disclosure of location information for phone number (657) 201-6097 ("POWELL PHONE"), which is believed to be used by POWELL, for a period of 45 days.

15. On March 15, 2022, Postal Inspectors in Alabama executed a federal search warrant on a USPS parcel, which contained approximately 1.2 pounds of marijuana. A review of surveillance video showed that POWELL had shipped this parcel

from a post office located at 7377 La Palma Avenue, Buena Park, CA 90622 ("Buena Park post office"). At that time, POWELL PHONE was located at the Buena Park post office.

16. On April 21, 2022, United States Magistrate Judge John D. Early issued a warrant authorizing the disclosure of location information for POWELL PHONE, for a period of 45 days.

17. On May 2, 2022, at approximately 3:43 p.m., POWELL PHONE was located at the Buena Park post office. I learned from postal personnel that POWELL had mailed the SUBJECT PARCEL, which was destined to "Mrs Marline Scott, 2246 Atkins Drive NW, Huntsville, Alabama 35810."

18. On May 3, 2022, HSI Special Agent Ed Angeo ("HSI Angeo") observed that the SUBJECT PARCEL exhibited the following characteristics:

- a. The parcel was a cardboard box;
- b. The parcel bore a hand-written mailing label; and
- c. The parcel did not contain a business account number.

19. On May 3, 2022, I used the CLEAR¹ database to search the listed sender and recipient information. Although the sender information was listed as "'Mrs. Norma Grant, 310 S. Jefferson St. Placenta, OC 92870," I believe the mailer meant "Placentia." No results were located for the listed sender information. I learned the name "Marline Scott" was not associated with the listed recipient address.

¹ CLEAR is a public information database used by law enforcement that provides names, addresses, telephone numbers, and other identifying information.

20. The SUBJECT PARCEL is currently secured at the HSI office in Santa Ana, California.

Positive Canine Alert on the SUBJECT PARCEL

21. On May 3, 2022, Placentia Police Department Canine Handler Officer Jeffrey Irvine and his narcotics-detection canine "Kyra" conducted an exterior examination of the SUBJECT PARCEL. Officer Irvine informed SA Angeo that Kyra gave a positive alert to the SUBJECT PARCEL, indicating the presence of controlled substances or other items that emitted the odor of controlled substances.

22. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, are documents setting forth information provided by Officer Irvine regarding Kyra's training and history in detecting controlled substances, and investigation of the SUBJECT PARCEL.

VI. CONCLUSION

23. Based on the above, I believe there is probable cause to believe the SUBJECT PARCEL described in Attachment A contains evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled

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Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance).

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 10th day of May 2022.

DOUGLAS F. McCORMICK

UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

PARCEL TO BE SEARCHED

The SUBJECT PARCEL is a USPS Priority Mail parcel bearing tracking number 9505 5141 4197 2122 8813 35. The SUBJECT PARCEL is a white cardboard box weighing 7 pounds, 11 ounces. The SUBJECT PARCEL is addressed to "Mrs Marline Scott, 2246 Atkins Drive NW, Huntsville, Alabama 35810." The return address listed on the SUBJECT PARCEL is "Mrs. Norma Grant, 310 S. Jefferson St. Placenta, OC 92870 [sic]." The SUBJECT PARCEL was paid with \$34.45 in postage and postmarked on May 2, 2022, in Buena Park, CA 90622.

The SUBJECT PARCEL is currently in the custody of Homeland Security Investigations in Santa Ana, California.

ATTACHMENT B

ITEMS TO BE SEIZED

The following are the items to be seized from the SUBJECT PARCEL, which constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance):

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Any associated packaging.

EXHIBIT 1

**Placentia Police Department**

401 E CHAPMAN AVE PLACENTIA CA 92870 P: 714 993 8164

DR # 22-01549 - Crime/Incident Report Report Cover Sheet

REPORT DATE / TIME May 3, 2022 14:56	BEAT / REPORTING DISTRICT / SUBDIVISION 4 / SUBDIVISION 5 Beat 2 / RD 26	EVENT START DATE / TIME - EVENT END DATE / TIME May 3, 2022 12:20 - 13:03
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INCIDENT INFO

OFFENSE CODE

K9 INCIDENT REPORT

OFFENSE LOCATION

166 E LA JOLLA ST, at PARKING LOT, PLACENTIA, CA 92870

INVOLVED ORGANIZATIONS

INVOLVEMENT	NAME	ADDRESS
R-1	US DEPARTMENT OF HOMELAND SECURITY	34 CIVIC CENTER PLZ, 4, SANTA ANA, CA 92701

REPORTING OFFICER SIGNATURE / DATE

J IRVINE #1251 May 5, 2022 12:10 (e-signature)

PRINT NAME

J IRVINE #1251

SUPERVISOR SIGNATURE / DATE

J ALCALA #1228 May 5, 2022 13:34 (e-signature)

PRINT NAME

J ALCALA #1228

Placentia Police Department

401 E CHAPMAN AVE PLACENTIA, CA 92870 P: 714.993.8164

NOT Summarized report. More data regarding this report may exist in the RMS.
 Made by RMS on May 5, 2022 15:15

DR # 22-01549 - Crime/Incident Report Report

REPORT DATE / TIME May 3, 2022 14:56	BEAT / REPORTING DISTRICT / SUBDIVISION 4 / SUBDIVISION 5 Beat 2 / RD 26	EVENT START DATE / TIME - EVENT END DATE / TIME May 3, 2022 12:20 - 13:03
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PRIMARY REPORTER

J IRVINE #1251

REPORT TAKEN LOCATION

166 E LA JOLLA ST, at PARKING LOT, PLACENTIA, CA 92870

STAT REPORTING

- | | |
|---|---|
| <input type="checkbox"/> School Incident | <input type="checkbox"/> Pursuit |
| <input type="checkbox"/> Transient-Related | <input type="checkbox"/> Gang |
| <input type="checkbox"/> Narcotics | <input type="checkbox"/> Graffiti |
| <input type="checkbox"/> Alcohol | <input checked="" type="checkbox"/> K9 Deployed |
| <input type="checkbox"/> Juvenile | <input type="checkbox"/> Taser Deployed |
| <input type="checkbox"/> Confidential Victim (PC 293) | <input type="checkbox"/> Domestic Violence |
| <input type="checkbox"/> AED Deployed | <input type="checkbox"/> Hate Crime |
| <input type="checkbox"/> COVID-19 | <input type="checkbox"/> Be Well OC Referral |
| <input type="checkbox"/> Courtesy Report | |

NARRATIVE

On 5/3/2022, at approximately 1220 hours, I was assigned as a Canine Handler for the Placentia Police Department. Special Agent Angeo from the U.S. Department of Homeland Security contacted me requesting I conduct a narcotics sniff of a package they had seized. Special Agent Angeo informed me he would bring the package to the Placentia Police Department. Due to Special Agent Angeo's ongoing narcotic investigation, I decided to utilize my Police Service Dog "Kyra" who is trained and certified in drug detection.

At approximately 1228 hours, Detective Reihanifam (Cypress PD /TFO) and Special Agent Angeo (HSI), arrived at 166 E. La Jolla. Special Agent Angeo provided me with a total of three white United States Postal Service packages. I requested Special Agent Angeo not to reveal to me which package possibly contained the narcotics. Prior to placing the packages in the upstairs break room, I deployed PSD "Kyra" to conduct a narcotics sniff of the break room. PSD "Kyra" did not show any alerts inside the room.

Special Agent Angeo placed all three packages on the floor in the room. I deployed PSD "Kyra" off-leash to sniff the packages. PSD "Kyra" sniffed the third box, which was a white United States Postal Service package (USPS Bar Code # PS00010133700). As she was sniffing the top portion of the package, I noticed distinct behavioral changes in PSD "Kyra." Her ears had a forward lean, her muscle tone became more rigid, and her breathing became more concentrated. PSD "Kyra" placed her nose on the top seam of the postal package. PSD "Kyra" took a deep breath and left her nose in the same place as a final alert, as trained. I recognized these behaviors to indicate PSD "Kyra" had located the odor of drugs.

I notified Special Agent Angeo that PSD "Kyra" had alerted to the third package. Special Agent Angeo told me the package the PSD "Kyra" had alerted to, was the package involved in the ongoing investigation.

This case is an ongoing investigation by the U.S. Department of Homeland Security. At this time, Special Agent Angeo informed me they would be obtaining a search warrant. Special Agent Angeo took possession of the package. Refer to Special Agent Angeo's original report for further information (HSI Case # OR02TS19OR0030).

K9 Background:

REPORTING OFFICER SIGNATURE / DATE

J IRVINE #1251 May 5, 2022 12:10 (e-signature)

PRINT NAME

J IRVINE #1251

SUPERVISOR SIGNATURE / DATE

J ALCALA #1228 May 5, 2022 13:34 (e-signature)

PRINT NAME

J ALCALA #1228

Placentia Police Department

401 E CHAPMAN AVE PLACENTIA, CA 92870 P: 714.993.8164
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PSD Kyra is a Belgian Malinois and has been with the Placentia Police Department since March of 2016. PSD Kyra is trained in narcotic detection and is certified in the detection of four narcotic odors: cocaine, heroin, marijuana, methamphetamine and their derivatives. PSD Kyra will alert to the odor through several behavior changes that can be seen and heard. PSD Kyra's final response is passive, where she will point with her nose and stare at the source of the odor. A secondary final response PSD Kyra will scratch at the source of the odor. This final response may also indicate items recently contaminated with the odor of one or more of the listed narcotics.

PSD Kyra and her previous handler completed approximately 40 hours of basic narcotic training with Christopher Anderson through "Goldstone K9 LLC." Christopher Anderson is the lead instructor at Goldstone K9. On March 04, 2016, PSD Kyra successfully passed the narcotic detection test through the California Narcotic Canine Association ("CNCA"). PSD Kyra was certified through CNCA and the certifying official was Eric Oden. On July 20, 2016, PSD Kyra successfully passed the Commission on Police Officer Standards and Training (P.O.S.T) narcotic detection test. The P.O.S.T evaluator for this certification was Coby Webb (Riverside Sheriff's Department). On June 21, 2017, PSD Kyra successfully passed the Commission on Police Officer Standards and Training (P.O.S.T) narcotic detection test. The P.O.S.T evaluator for this certification was Rebeka Mondon. PSD Kyra has conducted several narcotic detection sniffs in the field resulting in the seizure of hundreds of pounds of narcotics and several million dollars of U.S. currency (narcotic related proceeds).

I, Jeffrey Irvine, have attended and completed the Fullerton College Police Academy POST certified basic police academy in March 30, 2014. This academy included approximately 40-hour block of instruction on narcotics enforcement. After graduation, I was employed as a police officer with the City of Placentia since March 15, 2015. During this time, I completed a formal field-training program, which included instruction on types of drugs, including drug identification, and on enforcement of violations of various California Health and Safety Code violations. I have been involved in approximately 200-300 narcotics related investigations, have made approximately 100 narcotic related arrests for possession of narcotics, including but not limited to possession of methamphetamine, heroin, marijuana, cocaine, drug paraphernalia, and prescription drugs, and have made approximately 3 arrests for possession for sales of narcotics. I have testified as an expert in narcotic sales in Orange County Superior Court (North Justice Center).

I have been PSD Kyra's handler since December of 2020. In February of 2021, PSD Kyra and I completed 200 hour of basic narcotic training with Ken Greenleaf of "Drop the Lead" K-9 Academy. On February 5, 2021, PSD Kyra successfully passed the Commission of Police Officer Standards and Training (P.O.S.T) narcotic detection test. The P.O.S.T. evaluator for this certification was Steve Overly. Ken Greenleaf is the lead instructor for the Placentia Police Department K-9 Unit.

PSD Kyra and I continue to train weekly and we attend monthly training with Ken Greenleaf. These weekly and monthly sessions consist of building, vehicle, luggage, package, and outdoor narcotic searches. PSD Kyra and I train regularly around distractions of noise, food, and animal odors. During training, actual narcotics are used and "pseudo-drugs" are not present. We have also incorporated uncirculated money into training and PSD Kyra didn't alert to the money. In addition to the training I have received with PSD Kyra, I previously assisted in training other patrol and narcotics canines, and I have attended additional narcotic related courses.

REPORTING PARTY 1

REPORTING PARTY- (ORGANIZATION)

R-1 US DEPARTMENT OF HOMELAND SECURITY

ORGANIZATION TYPE

Government

ORGANIZATION INDUSTRY

Law Enforcement

PHYSICAL ADDRESS

34 CIVIC CENTER PLZ, 4, SANTA ANA, CA 92701

REPORTING OFFICER SIGNATURE / DATE

J IRVINE #1251 May 5, 2022 12:10 (e-signature)

PRINT NAME

J IRVINE #1251

SUPERVISOR SIGNATURE / DATE

J ALCALA #1228 May 5, 2022 13:34 (e-signature)

PRINT NAME

J ALCALA #1228**Placentia Police Department****401 E CHAPMAN AVE PLACENTIA, CA 92870 P: 714.993.8164****Ma k43 RMS o m v2 0 gene ated by C GR T #2197 on May 5, 2022 15 15**

PHONE NUMBER

(714) 972-4108 (Work Phone)

INCIDENT INFO

INCIDENT TYPE

K9 INCIDENT REPORT

OFFENSE LOCATION

LOCATION NAME / STREET ADDRESS/LOCATION NAME / APT, UNIT, STE / DESCRIPTION

166 E LA JOLLA ST

CITY

PLACENTIA

STATE

CA

ZIP

92870

COUNTRY CODE

US

INTERSECTION STREET

PARKING LOT

LOCATION CATEGORY

Commercial/ Office Building

BEAT / REPORTING DISTRICT / SUBDIVISION 4 / SUBDIVISION 5

Beat 2 / RD 26

PUBLIC / PRIVATE

Private

REPORTING OFFICER SIGNATURE / DATE

J IRVINE #1251 May 5, 2022 12:10 (e-signature)

PRINT NAME

J IRVINE #1251

SUPERVISOR SIGNATURE / DATE

J ALCALA #1228 May 5, 2022 13:34 (e-signature)

PRINT NAME

J ALCALA #1228

Placentia Police Department

401 E CHAPMAN AVE PLACENT A, CA 92870 P: 714.993.8164

Ma k43 RMS o m v2 0 gene ated by C GR T #2197 on May 5, 2022 15 15

**Placentia Police Department**

401 E CHAPMAN AVE PLACENTIA CA 92870 P: 714 993 8164

DR # 22-01549 - Supplement - 22-00518 Report

REPORT DATE / TIME May 7, 2022 08:46	EVENT START DATE / TIME - EVENT END DATE / TIME May 3, 2022 12:20 - 13:03	PRIMARY REPORTER J IRVINE #1251
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REPORT DESCRIPTION

Supplemental Report

SUPPLEMENT TYPE

K9 use

NARRATIVE

On 5/3/22, at approximately 1220 hours, I conducted a narcotics sniff of a package for Special Agent Angeo. In the narrative of my original report, I put the wrong USPS package number (PS00010133700) for the package. The correct UPS package number on the package is USPS # 9505514141972122881335.

Refer to Special Agent Angeo's report for further information.

INVOLVED ORGANIZATIONS

INVOLVED ORGANIZATION- NAME

O-1 US DEPARTMENT OF HOMELAND SECURITY

ORGANIZATION TYPE

Government

ORGANIZATION INDUSTRY

Law Enforcement

PHYSICAL ADDRESS

34 CIVIC CENTER PLZ, 4, SANTA ANA, CA 92701

PHONE NUMBER

(714) 972-4108 (Work Phone)

INVOLVEMENT TYPE

Other - Investigating Agency

INVOLVED LOCATIONS

LOCATION

166 E LA JOLLA ST, at PARKING LOT, PLACENTIA, CA 92870

REPORTING OFFICER SIGNATURE / DATE

J IRVINE #1251 May 7, 2022 08:58 (e-signature)

PRINT NAME

J IRVINE #1251

SUPERVISOR SIGNATURE / DATE

J ALCALA #1228 May 7, 2022 09:07 (e-signature)

PRINT NAME

J ALCALA #1228

Placentia Police Department

401 E CHAPMAN AVE PLACENTIA, CA 92870 P: 714.993.8164

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